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June 7, 1995

William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: Ex Parte Submission, PR Docket 92-235

Dear Mr. Caton:

This letter will supplement the Comments, Reply Comments and Ex Parte submissions submitted in the above-referenced Docket on behalf of Securicor PMR Systems Limited ("Securicor PMR") and its affiliate, Linear Modulation Technology Limited ("LMT"). Securicor PMR and LMT are referred to herein collectively as "Securicor."

From the earliest days of this proceeding, Securicor has been a strong proponent of the FCC's initiative to "refarm" the Private Land Mobile Radio bands below 512 MHz to increase channel capacity in, and to promote the more efficient use of, these bands. Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify the Policies Governing Them (Notice of Proposed Rule Making), 7 FCC Rcd 8105 (1993) ("NPRM"). In its NPRM, the FCC proposed, among other things, to ultimately channelize the 72-76 MHz and 150-174 MHz bands in 5 kHz blocks and the 421-430 MHz, 450-470 and 470-512 MHz bands in 6.25 kHz blocks. LMT's Managing Director, Peter Hilton, participated in the May 1993 refarming roundtable sponsored by the FCC and there described the capabilities of the 5 kHz "Linear Modulation" or "LM" technology that has been developed by Securicor and is now deployed in the 220 MHz band in the United States, in the 70 MHz, 150 MHz and 220 MHz bands in the United Kingdom and in the 150 MHz band in Hungary. Securicor anticipates that 5 kHz LM technology will soon be deployed in Australia and South Africa as well.

Since the November 6, 1992 release of the NPRM and the close of the Comment and Reply Comment cycle in this Docket, several critical developments have occurred that must inform the decisions to be reached on refarming.

First, Congress has amended Section 309 of the Communications Act to provide the FCC the authority to issue Title III radio licenses by competitive bidding. The FCC in fact has now held auctions to issue nationwide and regional narrowband PCS licenses, IVDS licenses and, most recently, broadband PCS licenses to serve the "Major Trading Areas." The broadband PCS auctions indeed realized over seven billion dollars in revenues, which of course speaks clearly to the demand for spectrum, the economic value of the spectrum and the utility of capturing this economic value in public funds.

Second, the 220 MHz industry in the U.S. is now well on its way to success. Over three thousand channels of 5 kHz equipment are now in commercial operation in the U.S., with many more being constructed each month. By year's end, and the December 31, 1995 construction deadline for the non-nationwide commercial systems, it is likely that over twelve thousand channels of 5 kHz equipment will be in full operation in the U.S. Many of these systems will be constructed employing LMT equipment; others will be constructed with equipment supplied by other vendors, including SEA, Inc., NTT, Uniden and E.F. Johnson Co, among others. These vendors are supplying an ever-increasing and diverse range of products to serve the growing customer base in the 220 MHz band.

Third, the pace of technology has not stood still. Although 5 kHz channelization may reflect the current state-of-the-art in commercially deployed systems, in Securicor's view, it is clear that even narrower bandwidths will be commercially realizable in the forseeable future. This is of course fully consistent with the evolution of technology and to be expected.

Finally, the increasing globalization of the equipment and service markets have quickened. U.S. leadership in developing and deploying spectrally-efficient technology was significantly furthered by the Commission's allocation of the 220 MHz band as the first commercial allocation for 5 kHz equipment in the world. 12.5 kHz channelization was first commercially deployed in the U.K. twenty five years ago, and the world equipment markets for that technology have fully matured and are populated by many competitors in the Pacific Rim, in North and South America and in Europe. Since the FCC's decision to commercially deploy 5 kHz technology in the 220 MHz band, other nations, including the U.K., have followed this lead. These nations and many others will pay close attention to the Commission's decision in this Docket. With a refarming decision that has to last for two, if not three, decades, a decision evidencing U.S. leadership in the deployment of spectrally-efficient technology will reap enormous benefits for the public during its life-cycle

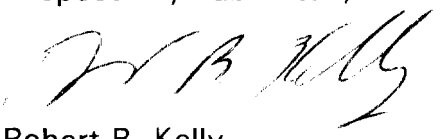
For its part, since 1993, Securicor has entered into strategic ventures with U.S. partners, among them E.F. Johnson Co. (in which Securicor holds a minority interest) and Roamer One, Inc., to deploy 5 kHz LM equipment in the 220 MHz band. Securicor Communications, Inc., the U.S. affiliate of Securicor, has acquired Securicor TeleSciences, Inc., headquartered in Moorestown, New Jersey, which provides an array of telecommunications products and services and which assembles and tests the LMT equipment that is used in the construction of 220 MHz base stations.

These changes in the decisional landscape since release of the NPRM argue, in Securicor's view, for the FCC to set policy directions in this Docket that provide for the optimum economic use of the spectrum allocated to the PLMR bands. With the revenues generated by the recent auctions, the costs of inefficient and uneconomic spectrum use, whether expressed in terms of foregone federal revenues or lost system capacity, have never been clearer. The Commission's decision must also enable the marketplace to dynamically select the best technological solution which may change over time as technology develops and which may vary depending upon the users' needs. Finally, the Commission's decision must establish a level playing field between competing technologies so that the marketplace may fairly select the best solutions.

Given these considerations, in its recent ex parte submissions in this Docket, Securicor has suggested that the FCC adopt a band channelization plan in the PLMR bands below 512 MHz that employs 2.5 kHz blocks. This "2.5 kHz or more" band plan would enable a licensee to tailor its bandwidth more precisely to its real needs and would avoid the loss of capacity due to the licensing of unneeded spectrum. At the same time, 2.5 kHz or more licensing would enable the FCC to maximize the revenues realized from the licensing of these bands, either through auctioning or dynamic spectrum pricing (assuming proper statutory authority). It would also further competition between technologies (for example, between 5 kHz and 12.5 kHz solutions) and thus enhance the diversity of products and services available to end users and promote competition between manufacturers. This bandwidth competition, in turn, should result in ever more efficient and economic technical solutions.

Securicor appreciates the opportunity to have participated in the debate in this Docket. If there are any questions regarding this submission, please contact this office.

Respectfully submitted,



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